Partial migration of existing service with INP using RCF arrangement.

Full migration of existing service without INP.

Full migration of existing service with INP using RCF arrangement.

Addition of new link to existing account.

3. The following additional order types will be flow through in August 1998:

Platform

Migration of existing account "as-is" (check the box).

Migration of existing account "as specified" ("as-is" plus or minus the following features):

Call Waiting, 3-Way Calling, Call Forwarding, Speed Calling 8 and 30, and Touch Tone.

PIC modifications including PIC freeze.

LPIC modifications including LPIC freeze.

Customer/Company initiated blocking

Remarks data only delete an auxiliary line.

Phonesmart.

Call Forwarding II

APPENDIX 3

Bell Atlantic-NY will provide flow through for the following order types after August 1998:

Resale

Hunting

Partial Acquisition

Complex listings

Outside moves

Call Answering

Modifications/cancels

Suspensions

Restorals

Intellidial

Direct Inward Dialing

Ringmate

Flexpath

UNE

New Link

- 10 new links or greater completed in Level 4
- If SBN in not established
- Expedites
- Supplemental activities

Partial Migration

- Premium links
- If SBN is not established
- Complex and additional listings
- Any listings other than NLST for INP, and that is changing from existing listings
- Migrate BTN and create new BTN

Hunting

DPAs

Contractual agreements

Expedites

Supplemental activities

Full Migration

Premium links.

If SBN is not established

Complex and additional listings

Any listings other than NLST for INP, and that is changing from additional listings

Hunting

DPAs

Contractual agreements

Expedites

Supplemental activities

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350
Internet Address: http://www.dps.state.ny.us

PUBLIC SERVICE COMMISSION

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JAMES D. BENNETT

LAWRENCE G. MALONE
General Counsel

JOHN C. CRARY
Secretary

March 6, 1998

To potential bidders:

The New York State Department of Public Service is seeking a vendor to conduct an evaluation of Bell Atlantic New York's operational support systems (OSS). The evaluation will encompass the development of a specific testing plan, and execution of that plan. The attached Request for Proposal (RFP) outlines the scope of this project.

Vendors interested in responding to this RFP must submit 15 copies of their proposal by March 23, 1998. Your proposal, all communications, and any specific questions should be directed to Mr. John Rubino, Office of Utility Efficiency and Productivity, 3 Empire State Plaza, Albany, New York 12223-1350 (518) 473-7157.

Sincerely,

Thomas G. Dvorsky, Director
Office of Utility Efficiency
& Productivity

Enclosure

Request for Proposal to Perform an Evaluation
of the OSS Interface Systems Offered by Bell Atlantic New York

I. Overview

1. As articulated in a number of Federal Communications Commission (FCC) Orders,[1] the Telecommunications Act of 1996 (the Act)[2] requires Bell Atlantic New York (BA-NY) to provide nondiscriminatory access to its operations support systems (OSSs) on appropriate terms and conditions, to provide the documentation and support necessary for competitive local exchange carriers (CLECs) to access and use these systems, and to demonstrate that BANY's systems are operationally ready and provide an appropriate level of performance. Compliance with these requirements will allow competitors to, among other things, obtain pre-ordering information, submit service orders for resold services and unbundled network elements (UNEs), submit trouble reports, and obtain billing information. BANY offers various systems, including both application-to-application interfaces and terminal-type/Web-based systems, that CLECs can use to access BANY's OSSs and thereby perform such tasks. The New York State Department of Public Service (DPS) has been considering the matter of BA-NY's compliance with the requirements of §271 of the Act in the context of Case 97-C-0271 (Petition of New York Telephone Company for Approval of its Statement of Terms and Conditions Pursuant to Section 252 of the Telecommunications Act of 1996 and Draft Filing of Petition for InterLATA Entry Pursuant to Section 271 of the Telecommunications Act of 1996). The DPS is seeking to retain consultants to assist it in assessing whether BANY is meeting these requirements.

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[1] *See* In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, FCC 96-325 (rel. Aug. 8, 1996) ("Local Competition Order"); In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, Second Order on Reconsideration, FCC 96-476 (rel. Dec. 13, 1996); In re Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, Memorandum Opinion and Order, FCC 97-298 (rel. Aug. 19, 1997) ("Michigan Order"); In re Application of BellSouth Corporation, *et al.* Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in South Carolina, CC Docket No. 97-208, Memorandum Opinion and Order, FCC 97-418 (rel. Dec. 24, 1997) ("South Carolina Order"). For information on how to find these decisions, as well as related 271 evaluations of the U.S. Department of Justice, on the WWW, see the Additional Information section at the end of this RFP.

[2] Pub. L. No. 104-104, 110 Stat. 56 (1996).

II. Background

A. Telecommunications Act of 1996

2. To effectuate its goal of opening all telecommunications markets to competition, the Telecommunications Act of 1996 requires incumbent local exchange carriers (ILECs), such as BA-NY, to permit interconnect of their networks with the networks of competing local telephone service providers (the CLECs), to offer their retail telecommunications services for resale at wholesale rates, and to provide non-discriminatory access to elements within their networks on an unbundled basis ("unbundled network elements") so that CLECs can use such elements to provide local telephone services. The Act thus contemplates competitive entry into local telephone markets through three paths: resale of ILEC services, the use of unbundled network elements, and full facilities-based entry. These paths are not mutually exclusive: a CLEC may use more than one of these paths in entering any particular local market.

3. Before providing certain interLATA services within the area served by its local telephone companies, the Telecommunications Act requires a Bell Operating Company (BOC), such as Bell Atlantic, to apply to the FCC for authority to do so. The Act provides for the removal of this in-region interLATA restriction within a particular state through the granting of such authority upon a finding by the FCC that the BOC has met several statutory conditions, including compliance with a fourteen-point "competitive checklist" and a showing that the BOC's entry into the interLATA market in that state would be in the public interest. In reviewing a BOC application to determine whether the BOC meets these statutory conditions, the FCC is required to consult with the U.S. Department of Justice and give "substantial weight" to its assessment of the BOC's application for in-region interLATA entry. The FCC is also required to consult with the public service commission of the state that is the subject of the application to verify that the BOC has met certain requirements, including compliance with the competitive checklist.

B. OSS Requirements

4. The term "operations support systems" refers generally to the systems, information, and personnel that support a telecommunications carrier's network elements and services. These systems are essential to its ability to administer its telecommunications network and provide services to consumers. As indicated above, the Telecommunications Act requires BOCs to provide CLECs with nondiscriminatory OSS access. Accordingly, BOCs must put in place appropriate electronic systems and interfaces and related manual processes to allow CLECs to access BOC OSS functions and thus, among other things, obtain pre-ordering information, submit service orders for resold services and unbundled network elements (UNEs), submit trouble reports, and obtain billing information. Compliance with these requirements is part of the fourteen-point

competitive checklist and thus is a condition of BOC entry into the in-region interLATA market.

5. In several decisions noted above, the FCC has articulated the analysis and standards that it applies in determining whether a BOC is meeting its OSS obligations. The following paragraphs provide an overview of these principles. However, the decisions themselves provide the definitive explanations of the requirements, and persons should consult those decisions for additional information.

6. *Analysis*: The FCC considers whether the access to OSS functions that the BOC provides adequately supports each of the three paths for competitive local entry described above: interconnection, unbundled network elements, and service resale. The FCC thus "seek[s] to ensure that a new entrant's decision to enter the local exchange market in a particular state is based on the new entrant's business considerations, rather than the availability or unavailability of particular OSS functions to support each of the modes of entry." *Michigan Order* ¶ 133. The FCC generally employs a two-part analysis.

7. First, the FCC examines the functionality of and support for the OSS systems and interfaces that a BOC provides to meet its obligation. Here, the FCC considers "whether the BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and whether the BOC is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them." *Michigan Order* ¶ 136. As to the *functionality* of those systems, the FCC determined that "[f]or those functions that the BOC itself accesses electronically, the BOC must provide equivalent electronic access for competing carriers" and that "the BOC must ensure that its operations support systems are designed to accommodate both current demand and projected demand of competing carriers for access to OSS functions." *Id.* ¶ 137. As to the *support* of those systems, the FCC has made particularly detailed determinations:

> A BOC . . . is obligated to provide competing carriers with the specifications necessary to instruct competing carriers on how to modify or design their systems in a manner that will enable them to communicate with the BOC's legacy systems and any interfaces utilized by the BOC for such access. The BOC must provide competing carriers with all of the information necessary to format and process their electronic requests so that these requests flow through the interfaces, the transmission links, and into the legacy systems as quickly and efficiently as possible. In addition, the BOC must disclose to competing carriers any internal "business rules," including information concerning the ordering codes [including universal service ordering codes ("USOCs") and field

> identifiers ("FIDs")] that a BOC uses that competing carriers need to place orders through the system efficiently.

Michigan Order ¶ 137 (footnotes omitted).

8. Second, the FCC considers whether the OSS systems and interfaces that the BOC has deployed are operationally ready, examining operational evidence to determine whether the functions that the BOC provides to CLECs are actually handling current demand and will be able to handle reasonably foreseeable demand volumes. The FCC has stated that the most probative evidence of operational readiness is actual commercial usage. Although carrier-to-carrier testing, independent third-party testing and internal testing can provide valuable evidence, they are less reliable indicators of actual performance than commercial usage. *Michigan Order* ¶ 138. The FCC considers whether specific performance standards exist and if they have been adopted by a state commission or agreed upon by the parties; standards adopted by a state commission in an arbitration decision are more persuasive evidence of commercial reasonableness than those unilaterally adopted by the BOC outside its interconnection agreement. *Id.* ¶ 141.

9. *Standard.* In the *Local Competition Order*, the FCC concluded that access to an ILEC's OSSs are critical to a CLEC's ability to use network elements and resale services to compete with the ILEC. The FCC determined that providing access to OSS functions falls within an ILEC's duty under section 251(c)(3) to provide unbundled network elements under terms and conditions that are nondiscriminatory, just, and reasonable, and its duty under section 251(c)(4) to offer resale services without imposing any limitations or conditions that are discriminatory or unreasonable. The FCC concluded that an ILEC must provide CLECs access to OSS functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing that is equivalent to what it provides itself where there is a retail analog (the "parity" standard) and generally must provide network elements, including OSS functions, on terms and conditions that "provide an efficient competitor with a meaningful opportunity to compete" (the "meaningful opportunity to compete" standard).

10. In subsequent decisions, the FCC has reiterated its determinations regarding both the parity and meaningful opportunity to compete standards. *See, e.g., Michigan Order* ¶ 130. Regarding the parity standard, the FCC has clearly stated that parity means equivalent access and that this is to be applied broadly:

> For those OSS functions provided to competing carriers that are analogous to OSS functions that a BOC provides to itself in connection with retail service offerings, the BOC must provide access to competing carriers that is equal to the level of access that the BOC provides to itself, its customers or its

> affiliates, in terms of quality, accuracy and timeliness. We conclude that equivalent access, as required by the Act and our rules, must be construed broadly to include comparisons of analogous functions between competing carriers and the BOC, even if the actual mechanism used to perform the function is different for competing carriers than for the BOC's retail operations.

Id. ¶ 139; *see also South Carolina Order* ¶ 98 (quoting the *Local Competition Order*, the FCC stated that, for such analogous OSS functions, "access to OSS functions must be offered such that competing carriers are able to perform OSS functions in 'substantially the same time and manner' as the BOC). The FCC specifically found that this standard of equivalent access applies to the OSS functions associated with pre-ordering, ordering, and provisioning for resale services; repair and maintenance for resale services; and repair and maintenance for UNEs; and measuring daily customer usage for billing purposes. *Michigan Order* ¶ 140. For OSS functions with no retail analog, such as the ordering and provisioning of unbundled network elements, a BOC must demonstrate that the access it provides affords a meaningful opportunity to compete. *Id.* ¶ 141.

11. *Scope*: To determine whether the BOC is meeting its duty to provide nondiscriminatory access to CLECs, the FCC considers all automated and manual processes a BOC uses to provide access to OSS functions. This includes the point of interface (or "gateway") for the CLEC's internal OSSs to interconnect with the BOC; any electronic or manual processing link between that interface and the BOC's internal OSSs (including all necessary back office systems and personnel); and all of the internal OSSs (or "legacy systems") that a BOC uses in providing network elements and resale services to a competing carrier. *Michigan Order* ¶¶ 134-35.

III. Purpose/Objective

12. DPS is seeking a telecommunications systems development, test, and integration vendor to (a) develop a comprehensive test plan that will be used to conduct an evaluation of the BA-NY OSS and OSS interface systems used to provide pre-ordering, ordering, provisioning, maintenance and repair, and billing functions to CLECs and (b) to conduct a detailed test of those systems based on the designed test plan.[3] The vendor chosen shall work for and under the direction of the DPS staff.

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[3] Similar tests by such a vendor may be required following BA-NY's entry into the in-region long distance market to ensure that BA-NY is continuing to meet its OSS obligations.

13. The project described in this proposal will be broken into two phases. In the first the vendor will develop the test plan, and in the second the vendor will assess the ease or complexity of developing interface software and test BA-NY's OSS and OSS interface systems with test software developed specifically for these tests. Development of the interface software and other test software will not be part of this bid-the DPS will issue a separate RFP for the development of that software, based on the test plan defined in Phase 1–but, as described below, the vendor will assist DPS staff in preparing this separate RFP. Proposed schedules for each of the phases are outlined below. In the response, the vendor should provide a total fixed-price response to Phase 1, and an estimate clear statement of resources for Phase 2 of the project, and should also break out the price for Phase 1 and Phase 2.

A. Phase 1

14. The test plan developed in this phase must be sufficient to allow the DPS, by reviewing the results of the specified tests of BA-NY OSS and OSS interfaces (including the development by a third-party vendor of software to emulate CLEC interfaces in order to perform the tests), to determine whether BA-NY's provision of access to OSS functionality enables and supports CLEC entry into the local telecommunications market (through the purchase of resold services and UNEs, both singly and in combinations) meets the legal requirements described above. At a minimum, the test plan will need to address testing of the functionality of multiple OSS and OSS interfaces in a number of different areas and of the operational readiness of these systems and interfaces, focusing on how each function performs under real-world scenarios. The test plan must also include a mechanism for testing the capacity of BA-NY's OSS systems and interfaces to determine whether they can presently support levels of demand that are reasonably foreseeable in a competitive market or whether they can readily be scaled to do so in the future. In developing the test plan, the vendor will need to consult with the DPS, BA-NY, and CLECs planning to provide local services in New York, and any other appropriate organizations.

15. Appendix A provides a high-level outline of criteria for evaluating OSS and OSS interfaces. While not intended as a comprehensive list, it provides a general background as to the types of factors that must be considered in developing a test plan. The purpose of providing Appendix A is to give potential vendors a framework for understanding the factors that must be addressed in the test plan. Once a vendor is selected, the DPS will make its staff available as needed to provide supplemental information and explanation.

16. The vendor will also assist DPS staff in drafting an RFP for the DPS to retain a third-party vendor, the Pseudo-CLEC, that will simulate the actual operations of a CLEC operating in New York State and using the various OSS systems and interfaces. As described below, the Pseudo-CLEC will build the "CLEC interface" associated with each application-to-application interface being tested and will

process inquiries and orders through each of the OSS and OSS interfaces being tested.

B. Phase 2

17. This aspect of the evaluation will require the vendor to evaluate the ability of a CLEC, with the available documentation and support from BA-NY, to develop interface systems and software to correctly obtain pre-ordering information, submit orders for resold services and UNEs, submit maintenance and repair requests, and bill their end users and to use the systems and software it develops to provide telecommunications services to its customers. This will include a documented assessment of the relative ease or complexity in creating the interface and of after-market support services such as help desks, hot lines, and account management services. This work will be accomplished in conjunction with the work of the Pseudo-CLEC, as well as actual CLECs that are ready and willing to participate. During the course of this engagement, the vendor should identify any additional areas of improvement that would materially reduce the cost, complexity, and time of this development to the Pseudo-CLEC, CLECs, or BA-NY.

18. The vendor must develop and perform detailed tests of BA-NY's OSS and OSS interfaces based on the test plan designed in Phase 1. The test evaluation in Phase 2 must be more comprehensive than simply testing the interfaces, themselves, as the vendor will also be required to measure other critical aspects of BA-NY's OSS interfaces, such as documentation and resource support provided to CLECs. During the test, the vendor will be expected to fully document all test results, as well as the detailed test methodology, so that any third party can readily and fully ascertain how the tests were performed and how the results were derived. The performance measures will be based upon the service standards approved by the PSC in the Carrier-to-Carrier Service Standards Proceeding (Case 97-C-0139).

IV. Specific Deliverables

A. Phase 1

19. The vendor will be expected to provide an initial detailed test plan document, which shall provide a comprehensive plan to test the relevant BA-NY OSS and OSS interfaces required for BA-NY to provide access to OSS functions in conformance with applicable legal requirements. The test plan document should, at a minimum, address the full breadth of issues addressed in Appendix A and the additional detail provided to the vendor by the DPS once a vendor is selected.

20. Prior to delivery of the final test plan, the DPS will provide the initial test plan document produced by the vendor to BA-NY and to certain CLECs for a one-week comment period. At the end of the comment period, the vendor will be expected to, in consultation with the DPS, perform a revision to the test plan,

incorporating reasonable recommended changes and additions to the test plan. The vendor will then be expected to deliver the final test plan document. BA-NY shall have the right to delay the commencement of Phase 2, or to terminate Phase 2, up until such time as the test commences.

B. Phase 2

21. The vendor will be expected to evaluate the ability of a CLEC, with the available documentation and support from BA-NY, to develop OSS interface systems and software for each OSS function and to use such systems and software to provide telecommunications services.

22. The vendor will be expected to perform the tests in full compliance with the test plan produced in Phase 1.

23. At the end of the test, the vendor will be expected to provide a document that includes a report on the test results. This report should provide the results of the test, per the test plan produced in Phase 1, and should specifically provide detail as to where BA-NY has met the requirements specified in the test plan. The report should describe any differences between the access to OSS functions BA-NY provides itself and that which its provides to CLECs and analyze the operational effect of such differences, and make recommendations to rectify such differences. The report should also discuss the vendor's assessment of the relative ease or complexity of creating the interface with the supplied documentation, any additional support required of and provided by BA-NY to create the interface,[4] the timeliness and level of support provided by after-market support services such as help desks and hot lines, and any additional areas of improvement that would materially reduce the cost, complexity, and time of this development and operation to the Pseudo-CLEC or BA-NY.

24. The vendor will also be expected to provide a supporting document that describes the underlying approach of the tests, describes the methodology used in each of the tests, and lists the test data and results of each test. This supporting document should provide sufficient detail to allow uninvolved third parties to fully understand how the test results were derived.

V. Schedule

25. The DPS proposes the following schedule for the implementation of Phases 1 and 2. Vendor responses may provide their own proposed schedules for Phases 1 and 2, if the vendor feels for any reason that the schedule provided herein is not achievable. If its proposed vendor schedule in the response differs

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[4] If such additional support is required or if existing documentation requires improvement, the additions and improvements shall be documented in a useable form and made available to all market participants.

from the schedule herein, the vendor should provide a rational for any such differences.

Vendor Selection

March 6	Issue RFP
March 13	Vendor conference–questions addressed
March 23	Vendor proposals due
March 30-31	Vendor interviews
April 1	Vendor selected

Phase I

May 1	Initial test plan document due
May 8	Comments on test plan due
May 18	Final Phase 1 deliverables due

Phase II

Phase II dates will be set upon the completion of Phase I, with the expectation that Phase II will be completed by July 31, 1998.

VI. Proposal Response

26. Vendors interested in responding to this RFP must submit 15 copies of the response by March 23, 1998, to the DPS. Responses must provide a clear demonstration of the vendor's understanding of the objectives and deliverables of this engagement and illustrate the vendor's approach to meeting these objectives in a timely and comprehensive fashion. The proposal response should include the following:

a. Detailed description of the vendors quaiifications to perform Phases 1 and 2 of this engagement: Vendor should discuss its general experience in building test plans and in performing comprehensive tests of information systems and system interfaces. Vendor should also discuss its specific experience, if any, in building test plans for and in testing telecommunications OSS and OSS interfaces.

b. Detailed response on how the vendor will meet each of the deliverables described for Phases 1 and 2: The vendor should make reference to how its deliverables will test against criteria similar to those specified in Appendix A. The response must include some estimate of required vendor resources, as well as a work break-down schedule for both Phases 1 and 2.

c. Details on the engagement team: Vendor must provide name and credentials of the vendor team members who will be involved in both Phase 1 and Phase 2.

d. Organizational structure for the engagement: The vendor must provide the structure of its resources that will be involved in the implementation. If this structure differs for Phase 1 and Phase 2, two organizational structures should be provided. The vendor should note which resources in this organizational structure will be dedicated to the project and which resources will be shared. Provide specific personnel that will work on each Phase of this project, their expected time commitment, and credentials. These personnel should be available for pre-selection interviews. For any shared resources, the vendor should specify what percentage of that resource's time will be allocated to the project. If the proposal includes personnel from other organizations, a clear statement of roles, responsibilities, and time allocations should be included.

e. Price proposal: The vendor shall provide a not-to-exceed cost in which the cost of professional services and out-of-pocket expenses are separately stated. The proposal must include the current professional fee rates for each individual. The bid shall provide a break-out of the price associated with Phase 1 work and the price associated with Phase 2 work. The vendor should detail any assumptions going into the price bid. The not to exceed price shall be inclusive of all expenses associated with the creation of the deliverables, including travel and incidentals. Payments under the contract will be made according to a negotiated schedule of deliverables, with a significant portion of Phase 1 and 2 payments retained until completion of Phase 2 deliverables. Proposals should identify key milestones for payment.

f. Other work: The vendor shall identify each existing contract or other agreement that it has with Bell Atlantic or Bell Atlantic's affiliates and shall describe any work that it or its affiliates are doing or have done for Bell Atlantic or Bell Atlantic's affiliates in the past two years. The vendor shall also identify and describe any work that it or its affiliates are doing or have done for other telecommunications services providers in the past two years.

27. Your proposal, all communications, and any specific questions should be directed to Mr. John Rubino, Office of Utility Efficiency and Productivity, 3 Empire State Plaza, Albany, NY 12223-1350. He can be reached at (518) 473-7157 or jjr@dps.state.ny.us.

VII. Additional Information

28. Various FCC orders and Department of Justice evaluations that discuss OSS issues are available on their respective Web sites. See the following Web pages:

http://www.fcc.gov/ccb/local_competition/welcome.html

http://www.fcc.gov/Bureaus/Common_Carrier/in-region_applications/

http://www.usdoj.gov/atr/statements/index.htm

In addition, in July 1997, New York Department of Public Service Administrative Law Judge Stein issued a Ruling Concerning The Status Of The Record regarding BA-NY's draft §271 application. This ruling, as well as other rulings and documents related to the §271 proceeding and the Carrier-to-Carrier Service Standards Proceeding, can be found on the New York State Public Service Commission's Website at the following address:

http://www.dps.state.ny.us

Appendix A

Introduction

The Telecommunications Act of 1996 provides for three modes of competitive entry into local telephone markets: interconnection, unbundled network elements, and service resale. As part of a 271 application to provide long distance service in its region, a Bell Operating Company (BOC) must demonstrate that it supports all three modes of entry through appropriate wholesale support processes, including the critical access to OSS functions. This involves support for pre-ordering, ordering, provisioning, maintenance and repair, and billing.

The standards and analysis for determining whether a BOC has met this statutory obligation have been articulated and applied in several prior decisions of the Federal Communications Commission and evaluations of the Department of Justice. In summary, the relevant standards are whether the access provided affords an efficient competitor a meaningful opportunity to compete and whether, as to functions provided to CLECs that are analogous to functions provided to itself in connection with its retail services, whether a BOC provides access to CLECs that is equivalent to that it provides itself. In applying these standards, the FCC and the Department consider the functionality of a BOC systems and the support it provides for them; the operational readiness of the systems; and the performance of those systems.

This document seeks to provide vendors responding to the NYPSC RFP (Request for Proposal to Perform an Evaluation of the OSS Interface Systems Offered by Bell Atlantic New York) a high-level framework of general factors generally considered in evaluating a BOC's OSS, OSS interfaces, and support processes generally. Because it cannot realistically list every function of a BOC's own systems and thus include everything necessary to make a parity showing, this document does not purport to lists everything that may be necessary to demonstrate compliance with the relevant legal standards. Rather, its purpose is to provide responding vendors an overview of the breadth of issues that must be addressed as part of the test plan and testing of Bell Atlantic New York's OSS and OSS interfaces.

I. GENERAL PRINCIPLES

A. *Industry Standards.* Whether the BOC has implemented, complies with, and supports applicable industry standards[1].

[1] In the context of this proceeding, BA-NY's implementation and compliance will be measured against the applicable industry standards as they have been implemented in New York.

1. As to any application area, whether the BOC has implemented the most recent version of the most recent industry standard(s) within a reasonable period of time.

2. The primary standards organizations today, all of which are part of the Alliance for Telecommunications Industry Solutions (ATIS), are as follows:

   a. Carrier Liaison Committee (CLC), including the Ordering and Billing Forum (OBF) and the Network Interconnection and Interoperability Forum (NIIF);

   b. Telecommunications Industry Forum (TCIF), including the Electronic Communications Implementation Committee (ECIC), Electronic Data Interchange (EDI) Committee, and the Service Order Subcommittee (SOSC); and

   c. Committee T1, including the T1M1 subcommittee on Internetwork Operations, Administration, Maintenance, & Provisioning.

3. De Facto Standards: Whether the BOC supports interfaces and protocols, that while not adopted by any recognized standards body, have achieved widespread use.

B. *Application-to-Application Interfaces*: Whether the BOC provides electronic access to OSS functions via application-to-application interfaces that allow CLECs to tie their OSSs directly to BOC OSSs via these interfaces. (In numerous instances, a BOC will be implementing application-to-application interfaces to comply with and support applicable industry standards.)

C. *Alternative Interfaces*: Whether the BOC provides alternative electronics interface for accessing key OSS functions.

   1. Some CLECs, at least initially, may not maintain their own internal OSSs for all OSS functional categories or may find that it is not feasible to tie their OSSs to a BOC's OSSs via application-to-application interfaces for some or all OSS functions.

   2. In such situations a graphical user interface (GUI) or other terminal-type interface may be the only viable, nondiscriminatory mechanism for certain CLECs to gain access to a BOC's OSSs.

D. *Support*: Both with regard to each OSS system and interface offered to CLECs and, more generally, with regard to its support processes generally, whether the BOC provides detailed and accurate documentation, training, and support.

   1. CLEC Implementation Support: Whether the BOC works cooperatively with CLECs at all stages of the development and

implementation process, from the development of requirements and specifications to testing and final roll-out.

2. Documentation

   a. Whether the BOC provides appropriate documentation for its wholesale support processes, including the following:

      (1) thorough support documentation regarding the implementation and usage of each of its OSS interfaces, *e.g.*, technical reference manuals and user's guides;

      (2) specifications for instructing CLECs on how to modify or design their systems to communicate with the BOC's interfaces and OSSs, including full documentation of the Applications Programming Interface (API) for all application-to-application interfaces;

      (3) information necessary to format and process their electronic requests so that these requests flow through the interfaces, the transmission links, and into the legacy systems as quickly and efficiently as possible, including

         (a) syntactical requirements;

         (b) internal "business rules";

         (c) ordering codes, including universal service ordering codes ("USOCs") and field identifiers ("FIDs"), used to identify the different services and features used in offering telecommunications services to customers;

         (d) other information necessary to enable CLECs to "pre-validate" service orders in a manner equivalent to the system edits and other validity checks performed by BOC service order negotiation systems for their retail service orders.

   b. Whether the BOC has an established, documented procedure for keeping its documentation up to date and for disseminating documentation to CLECs.

   c. Whether the BOC provides an electronic method of disseminating documentation and of notifying CLECs that updated documentation is available.

3. System/Interface Changes & Change Management

   a. Whether the BOC has an established, documented change management process for controlling and keeping CLECs and

any other interested persons informed of changes to its OSS interfaces and the OSSs underlying those interfaces.

b. Whether the BOC provides an electronic method of disseminating information regarding such changes.

c. Whenever it updates an OSS interface, whether to support a new release or version of a standard or for other purposes, whether the BOC maintains backward compatibility for a commercially reasonable period of time.

d. Whenever it replaces an OSS interface or system, whether the BOC maintains the obsolete interface or system for a commercially reasonable period of time to provide a transition period for users of that interface or system to move to other interfaces or systems.

4. Service Center/Help Desk: Whether the BOC provides one or more service centers, or "help desks," that CLECs can contact for support purposes (such as with questions regarding OSS system or interface specifications, other documentation, or usage), whether the centers have appropriate hours of operation, and whether they centers are adequately staffed terms of the number of persons and their level of expertise.

E. *Capacity*: Whether the BOC's support processes are able to support customers in reasonably foreseeable quantities or at least are scalable to such a level within a minimal time period.

1. "Reasonably foreseeable quantities" means quantities that competitors collectively would ultimately demand in a competitive market where the level of competition was not constrained by any limitations of the BOC's interfaces or support processes or by any other factors that the BOC may influence.

2. "Minimal time period" means a period that would not artificially limit the growth of competition, *i.e.*, at a pace sufficient "to ensure that a new entrant's decision to enter the local exchange market in a particular state is based on the new entrant's business considerations, rather than the availability or unavailability of particular OSS functions," Michigan Order ¶ 133.

3. Statements regarding CLEC forecasts and evidence of adequate capacity for those projections are not necessarily sufficient. To the extent that CLEC forecasts were constrained by limitations of a BOC's interfaces or support processes or by other impediments to competition, they would not provide a basis for a showing of adequate capacity.

4. An analysis of these issues should account for and discuss demand for the entire region served by the OSSs at issue. Thus, when a BOC deploys region-wide systems, since the capacity of the system to provide service in any state will necessarily be affected by regionwide usage, the analysis should consider its entire region, not merely the particular state for which a 271 application is being filed.

II. PRE-ORDERING

A. Application-to-Application Interfaces

1. Whether the BOC provides and supports an application-to-application interface to its OSSs that support pre-ordering functions related to service resale and the provision of network elements.

2. Whether a CLEC can readily integrate this application-to-application pre-ordering interface with the BOC's application-to-application ordering interface so that the CLEC can implement integrated systems for their representatives that provide seamless support of pre-ordering and ordering functions.

B. Industry Standards: Whether the BOC's pre-ordering interfaces support protocols that will be used in the forthcoming industry standards, CORBA and EDI.

C. Other General Considerations

1. *Query Response Times*: Whether the BOC's pre-ordering interfaces provide pre-order response in substantially the same time frames as the BOC receives such responses internally for similar functions.

2. *Data Updates*

a. Where a BOC uses separate databases for responding to BOC and CLEC pre-ordering queries, whether the databases used for responding to CLEC queries are updated as frequently as the databases used for responding to BOC queries.

b. Where, instead of providing an application-to-application interface for a particular pre-ordering functions, a BOC provides a database to the CLEC to load into the CLEC's systems and access internally, whether the BOC prepares and delivers to CLECs updates to such databases as frequently as it updates the databases used for responding to BOC queries.

D. Key Functions

1. *Address verification*: Whether the BOC provides access to address validation functions and whether responses to CLEC queries contain the same functional information as the BOC has for its own business

(for example, if a BOC provides building floor information, *e.g.*, 3d floor, for itself, whether it also provides floor information to CLECs).

2. *Telephone numbers*. Whether the BOC provides access to telephone number request, telephone number reservation, and telephone number cancellation functions, including whether CLECs have functionality equivalent to what the BOC provides itself for its retail business (*e.g.*, if a BOC supports reservation of vanity telephone numbers, whether it also offers this capability to CLECs through the electronic pre-ordering interfaces) and whether the BOC places any greater restrictions on the number or types of telephone numbers that a CLEC can request or reserve than it places on its own ability to request and reserve telephone numbers.

3. *Customer Service Records (CSR)*. Whether the BOC provides access to functions for accessing CSRs, including whether the BOC blocks or deletes any portion of the CSR, whether the CSR is provided in parsed or unparsed format, and whether there are any restrictions on the size of a CSR retrievable through an electronic request on a real-time basis.

4. *Service and product availability*. Whether the BOC provides access to functions that will allow CLECs to determine the services and products that are available to customers at particular locations, including whether the BOC provides a function for a feature validation request that allows the CLEC to determine what features and services are supported by a given central office switch.

5. *Due-date reservation and appointment scheduling*. Whether the BOC provides to due-date request, due-date reservation, due-date cancellation, and appointment scheduling functions. Whether the BOC provides non-discriminatory access to due dates and appointment dates, including whether it draws dates for both BOC and CLEC orders from the same date pool.

6. *Primary Interexchange Carrier (PIC) list*. Whether the BOC provides access to the PIC list applicable to a particular switch or telephone number.

7. *Facility availability*. To the extent that it provides its retail representatives with information regarding the availability of facilities necessary to fill an order, whether the BOC provides access to functions that give CLECs access to the same information provided to the BOC retail representatives.

8. *Primary Interexchange Carrier (PIC)*. Whether the BOC provides access to a function that identifies the subscriber's current PIC.

9. *Directory listing*: To the extent that BOC subscribers can contact a BOC representative to verify their directory listings, whether the BOC provides access to functions that give CLECs access to the same directory listing information that is provided to the BOC retail representatives.

III. ORDERING & PROVISIONING

A. Application-to-Application Interfaces/Industry Standards: Whether BOC provides and supports a single application-to-application interface to its OSSs that

1. supports ordering functions related to service resale and the provision of unbundled network elements;

2. complies with and supports the applicable ordering standards, presently including the EDI SOSC Version 7.0 EDI specification for ordering of telecommunications services and the OBF Local Services Ordering Guide Version 2.0, which provides the definition for the Local Service Request (LSR), and the new OBF LSOG Version 3 and TCIF EDI SOSC Version 8; and

3. can be readily integrated with the application-to-application pre-ordering interface so that CLECs can implement integrated systems for their representatives that provide seamless support of pre-ordering and ordering functions.

B. Other General Considerations

1. *Alternative Electronic Interface*: Whether the BOC provides an alternative terminal-type electronic interface, *e.g.*, a Web-based interface, for accessing key ordering functions related to service resale and the provision of network elements and, if so, whether that interface complies with the LSOG guidelines.

2. *Flow-Through*: Whether the BOC provides flow-through for the following local service orders:

(1) orders for services as to which there is flow-through for BOC service orders;

(2) orders for services that are analogous to services as to which there is flow-through for BOC service orders, *e.g.*, orders for an end-to-end combination of network elements (the "platform"); and

(3) orders for individual UNE loops.

C. Key Functions

1. Whether the BOC provides support, through all ordering interfaces offered, for both total services resale (TSR), including vertical features, and the full suite of unbundled network elements (UNEs), including loops, ports, trunks, E911, directory services, and operator services.
2. Whether the BOC provides support for migration-as-specified orders, migration-as-is orders, and new service orders.
3. Whether the BOC provides support for feature changes, service disconnect, service suspend, and move and change activities.
4. Order Status Functions:
   a. Whether the BOC provides electronic order status capabilities, including firm order confirmation (FOC), order completion notification, order jeopardy notification, and order rejection notification.
   b. Whether the BOC provides all these electronic notifications through the same single, standards-based application-to-application interface referred to above.
   c. To the extent that a BOC's retail representatives are able to interactively query status or other information about an order, whether the BOC provides CLECs an equivalent capability through its application-to-application and alternative interfaces.

IV. MAINTENANCE & REPAIR

A. Industry Standards/Application-to-Application Interfaces: Whether the BOC has implemented, complies with, and supports the standard interface for trouble administration for local services, the T1M1 standard T1.227 and T1.228 and the additional ECIC implementation guidelines for a trouble administration OSS interconnection system.

B. Alternative Interface: Whether the BOC provides an alternative terminal-type electronic interface, *e.g.*, a Web-based interface, for trouble administration.

C. Key Functions

1. Whether each trouble administration interface allows CLECs to place trouble tickets, close out trouble tickets, and receive status on open troubles.
2. Whether each trouble administration interface allows CLECs to perform tests on the services, such as a mechanized loop test (MLT).

V. BILLING

A. Industry Standards: Whether the BOC supports CABS format for wholesale bills and EMI/EMR format for message processing.

   1. A BOC should implement billing interfaces that provide billing data for resale and UNEs in these formats to be considered to be conforming to the standards.

B. Key Functions

   1. Whether the BOC provides monthly billing data electronically to CLECs.

   2. Whether the BOC provides daily usage feeds to CLECs with information of a sufficient detail for CLECs to prepare end-user bills.

BELL ATLANTIC - NEW YORK
Carrier To Carrier
Performance Standards and Guidelines
INTERIM GUIDELINES 1/98 - 12/98
MODE OF ENTRY

Resale

	BA Measure	CLEC Measure	BA Observ	CLEC Observ	Population Standard Deviation	Sampling Standard Deviation	Z-Score	Perf. Score	Entry's Weight Multiple	Weight %	Weighted Perf. Score
PRE-ORDERING											
Metric A - Response Time OSS Interface											
Customer Service Record									15	2.6%	
Due Date Availability									1	0.2%	
Address Validation									1	0.2%	
Product and Service Availability									1	0.2%	
Telephone Number Availability and Reservation									1	0.2%	
Metric B - OSS Interface Availability									20	3.5%	
ORDERING											
Metric D - Order Confirmation Timeliness											
% Order Confirmation within 24 hours (N-Mech < 10 lines)									15	2.6%	
% Order Confirmation within 48 hours (N-Mech < 10 lines)									5	0.9%	
% Order Confirmation within 72 hours (All Orders >10 lines)									5	0.9%	
% Order Confirmation within 2 hours (Flow-Thru)									20	3.5%	
Metric E - Reject Notice Timeliness											
% Reject Within 24 Hours (N-Mech < 10 lines)									10	1.7%	
% Reject within 48 Hours (N-Mech < 10 lines)									10	1.7%	
% Reject within 2 Hours (Flow-Thru)									10	1.7%	
% Reject within 72 Hours (All Orders > 10 lines)									10	1.7%	
Metric G - Timeliness of Completion Notification											
Completion Notification - % On Time									15	2.6%	
Metric H - % Flow Through Orders									20	3.5%	
PROVISIONING											
Metric J - Average Completed Interval											
Average Interval Completed - Total - No dispatch									10	1.7%	
Average Interval Completed - Dispatch (1-5 lines)									10	1.7%	
Average Interval Completed - Dispatch (6-9 lines)									5	0.9%	
Average Interval Completed - Dispatch (>10 lines)									5	0.9%	
Average Interval Completed - Total Dispatch									20	3.5%	
Average Interval Completed DS0									10	1.7%	
Average Interval Completed DS1									10	1.7%	
Average Interval Completed DS3									10	1.7%	
Metric K - % Completed within 5 Days											
Completed within 5 Days (1-5 lines) - Total									15	2.6%	
Metric L - % Missed Appointment - Company											
Missed Appointment - BA - Total									20	3.5%	
Average Delay Days - Total									10	1.7%	
Missed Appointment - BA - Dispatch									5	0.9%	
Missed Appointment - BA - No Dispatch									10	1.7%	
Metric M - % Missed Appointment - Facilities									10	1.7%	
Metric N - % Installation Troubles within 30 Days											
POTS: % Installation Troubles within 30 days									5	0.9%	
TROUBLE REPORTING (OSS)											
Metric O - Response Time OSS Interface											
Create Trouble									10	1.7%	
Status Trouble									10	1.7%	
Modify Trouble									10	1.7%	
Request Cancellation of Trouble									10	1.7%	
Trouble Report History (by TN/Circuit)									10	1.7%	
Test (POTS only)									10	1.7%	
TROUBLE REPORT RATE											
Metric P - Network Trouble Reports											
Network Trouble Report Rate									20	3.5%	
Network Trouble Report Rate - Loop									20	3.5%	
Network Trouble Report Rate - Central Office									20	3.5%	
Metric Q - % Missed Repair Appointments											
Missed Repair Appointments - Dispatched (Loop)									20	3.5%	
Missed Repair Appointments - Not Dispatched (CO)									5	0.9%	
Missed Repair Appointments - Total									15	2.6%	
Metric R - Mean Time to Repair (time to restore)											
Mean Time to Repair									15	2.6%	
Mean Time to Repair - Loop Trouble									15	2.6%	
Mean Time to Repair - CO Trouble									5	0.9%	
Metric S - % Out of Service > 24 Hours											
Out of Service > 4 hours									1	0.2%	
Out of Service > 12 hours									1	0.2%	
Out of Service > 24 Hours									20	3.5%	
All Troubles Cleared within 24 hours									10	1.7%	
Metric T - % Repeat Reports within 30 days									15	2.6%	
BILLING											
Metric V - Timeliness of Daily Usage Feed											
DUF in 4 Business Days									10	1.7%	
Metric W - Timeliness of Carrier Bill									10	1.7%	
									576		
Total Category Score (weighted)	0.000										
Penalty Credit	80										

● Maximum Monthly Credit Level of $937,500